

Hon. James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AUBRY MCMAHON,

Plaintiff,

v.

WORLD VISION, INC.,

Defendant.

Case No.: 2:21-cv-00920-JLR

**DECLARATION OF CASIMIR  
WOLNOWSKI IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT  
ON LIABILITY**

**NOTE DATE: MAY 5, 2023**

Casimir Wolnowski, upon oath affirms and declares:

1. I am an attorney and the senior managing counsel at Nisar Law Group, P.C., counsel for the plaintiff Aubry McMahon ("Plaintiff"). I am admitted to practice before this Court in this matter *pro hac vice*. I am competent to testify and make the following statements based upon my personal knowledge. If called to testify, I would repeat and affirm each and every statement made herein.

2. Attached as Exhibit 1 is a true and correct copy of an updated job description for the position of "call center customer service representative" posted March 7, 2022, Bates stamped WV000183-88 produced in discovery.

1           3.       Attached as Exhibit 2 is a true and correct copy of a job posting for customer  
2 service representative, Bates stamped WV000048-50 produced in discovery.

3           4.       Attached as Exhibit 3 is a true and correct copy of a document entitled “WVUS  
4 Devotion Guidelines,” Bates stamped WV002813 produced in discovery.

5           I declare under the penalty of perjury under the laws of the United States and the State  
6 of Washington that the foregoing is true and correct to the best of my knowledge.

7  
8 DATED: May 1, 2023

/s/ Casimir Wolnowski